

ID 0961
7.20.82
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TRIP REPORT

MIKE BROWN, AIR AND WASTE MGMT. DIV.

Date: 7-20-82 Time: 9:30 to 11:00 site Babin's Office: 11:45 to 1:00

Place: Arrcom; Rathdrum, Idaho. IDD 00-080-0961

People: Mike Brown: EPA - A & WMD
Athena Lalikos; EPA - IOO
Ken Babin; Idaho Dept. of Health
Warren Bingham; Owner

Purpose: RCRA ISS Inspection (Brown and Babin)
PCB Inspection (Athena)

Map: Attached Pictures: File 12 pictures
Samples: Taken

Notes:

Site: Rathdrum

- First RCRA inspection. Ken Babin had filled out an inspection report previously but the inspection was not too useful because it was carried out via telephone call and did not contain quality/quantity of information.
- Sites was disorganized and cluttered
 - Tanks were turned on their sides
 - Containers were stored here and there with some turned over leaking a tarry liquid leaking out.
- Ponding of oily water was seen around central processing area (Building 15 & 13).
- Roadway going around tanks and processing area had been soaked with oil for a long period of time.
- Most of the processing equipment was caked with oil and crude.
- Site according to Ken Babin was over the Spokane sole-source aquifer. Water table approximately 150 feet deep.
- No records or manifest were seen on site in the buildings.

USEPA RCRA



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2.

- Samples were taken 2900 225479 oil/water } Pool
by Athena 80 oil/water } Samples
Taken for PCBs 81 oil/water } and run
Analysis 82 soil } Priority
83 oil/water } Pollutant
(PP) Scan
- Tank # 16 & # 17 were found to be approximately 1/3 full of a sludge looking material.
- Tank # 19 was reported by Ken and Athena to be leaking approximately 1 ft off ground through seams.
- Tank trucks in various stages of disrepair were parked in the brush around the site.
- State or IOO was not aware of any SPCC plans for the site.

Office to Coeur d'Alene

- Followed Ken Babin to his office. Warren Bingham was put on notice of a possible NOV letter.
- Discussed Applicable Laws
 - (a) RCRA
 - (b) TSCA - PCB
 - (c) SDWA - Sole Source
 - (d) CWA - SPCC Plan
 - (e) Idaho Water Quality Law
- RCRA Violations - Company appears to have Interim Status although Alan Pickett signed for Warren Bingham as owner without Bingham's permission or knowledge.

B. General Facilities Standards

- 265.12 Notification of change of operators
- 265.14 Security
- 265.15 General Inspection requirement
- 265.16 Personnel Training

3.

C. Preparedness and Prevention

- 265.31 Equipment internal communication system, fire extinguishers, etc.
- 265.37 Arrangements with local authorities

D. Contingency Plan and Emergency Procedures

- 265.51 Contingency plan
- 265.55 Emergency coordinator
- 265.56 Emergency procedure

E. Manifest System, Record Keeping, and Reporting

- 265.71 Use of manifest system
- 265.73 Operating record
- 265.74 Availability, retention and disposition of records

Subpart G Closure and Post Closure

- 265.111 Closure performance standard

Subpart H Financial

- 265.142 Cost estimates for facility closure
- 265.143 Financial assurance for facility closure
- 265.147 Liability requirements

Subpart I Use and Management of Containers

- 265.173 Management of containers

Subpart J Tanks

- 265.194 Inspections
- 265.197 Closure